REMARKS

Claims 1-20 are pending in the application. These claims were rejected as follows:

Claims / Section	35 U.S.C. Sec.	References / Notes
1-16 & 18-20	§102(e) Anticipation	• Navarre (U.S. Patent No. 6,205,482).
17	§103(a) Obviousness	• Navarre (U.S. Patent No. 6,205,482); and • Smith, et al. (U.S. Patent No. 6,502,191).

5   Applicant thanks the Examiner for the withdrawal of the restriction requirement and willingness to consider all claims presented.

Applicant has provided discussion below distinguishing the present invention from the art cited against it and respectfully requests reconsideration of the application in light of these remarks.

10   Applicant's use of reference characters below is for illustrative purposes only and is not intended to be limiting in nature unless explicitly indicated.

35 U.S.C. §102(e), CLAIMS 1-16 AND 18-20 ANTICIPATION BY NAVARRE

1. Navarre does not anticipate the independent claims because it fails to

15 *teach or suggest a required element of the independent claims, namely that the data files that are transferred contain both language elements that are executable by the client as well as language elements that are executable at the server.*

RESPONSE B

In the OA, on p. 2-3, the Examiner identified the elements of Navarre that were being read on claim 1 of the present invention. In relevant part, the Examiner stated that Navarre discloses:

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> a server computer that is configured to store datafiles
> and transmit them to said client computer when said
> client computer calls them by sending a
> corresponding datafile address to said server, wherein
> said datafiles are structured to contain both language
> elements executable at said client as well as
> language elements executable at said server (column
> 2, lines 4-10, 28-35, column 3, lines 1-5, a gateway
> server that receives HTTP requests from clients,
> receives information from other servers, and sends
> the information to the requesting client);

Navarre discloses a system and a method for executing a request from a client application, wherein the client sends only a single request to a gateway application, which converts /translates the request into appropriate data access transactions for accessing a number of further servers. Thus the user has just to

20   send one single request to a gateway application instead of transmitting several data access transactions to several server applications.

When a request from a client application is received by the gateway, the data access transaction identification routine identifies the technical implementation of the request. Next, a set of data access transactions are

25   transmitted to the respective server applications (column 3, lines 6 to 26). After the targeted server applications processes the received data access transaction, the gateway receives a set of responses from the respective server applications (column 3, lines 41 to 43). A response integration routine sorts and merges the received information using the rules defined for processing the request. An

integrated response presentation routine accesses application presentation

objects, which preferably dynamically builds an HTML page to return to the client

application (column 3, lines 56 to 59).

The present invention differs substantially from the prior art according to

5   Navarre, as the data files according to the independent claims of the invention

contain both language elements executable at the client as well as language

elements executable at that server. Navarre operates as a translator—it takes in

a data file (or transaction) from one client, and then formulates new data files to

send to the servers. However, in no case does the data file contain language

10   elements that are both executable at the client as well as the server.

According to column 3, lines 56 to 59 of Navarre, an HTML page for return

to the client application is dynamically built. This means that the data received

from the different server applications are used to create a new HTML page. This

HTML page does, of course, contain language elements executable at the client

15   as it is common in the prior art. However, there is no disclosure that this data file

contains any language elements executable at the gateway. In Navarre there is

no other file disclosed having language elements being executable at the client

and the gateway, as claimed in the independent claims.

   2. *Navarre fails to teach the required element of an interpreter that*

20   *interprets and executes language elements on the gateway of the data file (the*

data file containing both client and server executable language elements).

On p. 3 of the OA, the Examiner indicates that Navarre discloses:

> an interpreter in said server configured to interpret
> and execute said language elements executable at

> said server (column 3, lines 6-24, 50-56, gateway
> server able to identify the technical implementation of
> the request, presentation languages supported, and
> other processing rules needed to satisfy the request);

5 However, as noted above, the data file according to the independent

claims must contain both language elements executable at the client as well as

language elements executable at the server. The Examiner appears to be

indicating that the fact that the gateway 220 is able to receive client requests

(3/6-8) and is also able to independently receive responses from the servers

10 (3/41-43) means that the Navarre discloses a data file structured to contain both

language elements executable at the client as well as language elements

executable at the server. However, this interpretation ignores an important

distinction in that a data file itself must contain both—it is not sufficient that the

interpreter be able to handle files that contain information related to the client

15 and the servers independently.

  Advantageously, the invention provides a simple technical solution that is

realized for the drive of different devices in a data network. With data files

containing executable codes for being executed on the server as well as on the

client, periphery devices being in communication with the server can be easily

20 controlled via the network. Particularly when the language elements executable

at the client correspond to a mark-up language, the data files can be edited with

most standard editors and text processing programs. This makes it easy to

create such control files, See paragraphs [0029], [0030], and [0031] of the

present patent application. The inventive system is not simply an obvious variant

25 of Navarre since it permits utilization in areas that would not be possible or, at

the very least, would be inefficient with the system of Navarre.

RESPONSE B

For these reasons, the Applicant asserts that the claim language clearly distinguishes over Navarre and respectfully request that the Examiner withdraw the §102(e) rejection from the present application.

35 U.S.C. §103(a), CLAIM 17 OBVIOUSNESS OVER NAVARRE IN VIEW OF SMITH

5   *3. Applicant relies on the above arguments and asserts that the addition of Smith does not provide a combination that teaches or suggests the data files being transferred that contain both language elements that are executable by the client as well as language elements that are executable at the server.*

In the OA, on p. 9, the Examiner rejected dependent claim 17 as being

10   obvious over the combination of Navarre and Smith.

Applicant relies on the arguments above, and therefore does not address the Smith reference added by the Examiner for disclosure related to elements of dependent claim 17. Applicant asserts that Navarre and Smith, alone or in combination, fails to teach or suggest data files being transferred that contain

15   both language elements that are executable by the client as well as language elements that are executable at the server.

For these reasons, the Applicant asserts that the claim language clearly distinguishes over the prior art, and respectfully request that the Examiner withdraw the §103(a) rejection from the present application.

20   **CONCLUSION**

Inasmuch as each of the objections have been overcome by the amendments, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered,

the rejections be withdrawn and that a timely Notice of Allowance be issued in

this case.

Respectfully submitted,

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7   RESPONSE B